

FILED

DEC - 7 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

DONALD EUGENE FIELDS II and
THEODORE JOHN SARTORI SR.,

Defendants.

4:22CR690 MTS/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning in or about January 2013 and continuing until in or about June 2017, within the Eastern District of Missouri, and in and affecting interstate and foreign commerce, the defendant,

DONALD EUGENE FIELDS II,

did knowingly attempt to recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit a person whom he believed was under the age of 18 years and would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).

COUNT 2

The Grand Jury charges that:

Beginning in or about January 2013 and continuing until in or about June 2017, within the Eastern District of Missouri, and in and affecting interstate and foreign commerce, the defendant,

THEODORE JOHN SARTORI SR.,

did knowingly attempt to recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit a person whom he believed was under the age of 18 years and would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 1594, upon conviction of an offense in violation of Title 18, United States Code, Section 1591 and 1594(a) as set forth in Counts 1 and 2, the defendants shall forfeit to the United States of America the following:
 - a. The defendants' interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and
 - b. Any property, real or personal, constituting or derived from, any proceeds that the defendants obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from, any proceeds that the defendants obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.
3. Specific property subject to forfeiture includes, but is not limited to, the following:
 - a. real property located at 918 W. Fitzgerald Ave, Gerald, Missouri 63037, and
 - b. 1995 Ford Mustang, VIN: 1FALP45T8SF155016
4. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

DIANNA R. COLLINS, 59641MO
Assistant United States Attorney